

IBEW
EXHIBIT 6.11

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

CENTRAL ILLINOIS LIGHT)	
COMPANY)	
d/b/a AmerenCILCO,)	
Proposed general increase in rates for)	Docket No. 06-0070
delivery service.)	
CENTRAL ILLINOIS PUBLIC)	
SERVICE)	
COMPANY d/b/a AmerenCIPS,)	
Proposed general increase in rates for)	Docket No. 06-0071
delivery service.)	
ILLINOIS POWER COMPANY d/b/a)	
AmerenIP,)	
Proposed general increase in rates for)	Docket No. 06-0072
delivery service.)	(consol.)

DEPOSITION ON WRITTEN QUESTIONS

**RESPONSE OF CELLNET TECHNOLOGY, INC. TO THE CROSS EXAMINATION
QUESTIONS PROPOUNDED BY THE AMEREN COMPANIES**

Cellnet Technologies, Inc. ("Cellnet") hereby submits its response to the Deposition on Written Questions propounded by the Ameren Companies ("Ameren"). Except as specifically stated herein, Cellnet reserves all objections to the Deposition questions until the use of Cellnet's testimony at a hearing before the Commission or otherwise.

QUESTIONS

Ameren Question 1.01: The "Introduction" section of the Written Questions submitted to you by the IBEW provides a definition for the term "metering service." In your responses to IBEW's Written Questions, is it your intent to provide a legal interpretation of the term "metering services," as defined in Illinois Administrative Code Part 460?

Response: No, I am not an attorney and will not provide a legal interpretation of the term "metering services."

Ameren Question 1.02: If your answer to Question 1.01 is in any way affirmative, please describe your education, training and experience in the field of law.

Response: N/A

Ameren Question 1.03: Of the 16 functions listed in (a) through (p) of pages 2 and 3 of IBEW's Written Questions, which, if any, of these functions will Cellnet or its subcontractors perform for the Ameren Companies as part of those companies' automated meter reading ("AMR") deployment?

Response: Cellnet will be providing the services detailed in the Agreement provided in response to IBEW Written Question 1.08.

Ameren Question 1.04: Have you had any communications with Commission Staff about whether Cellnet is subject to Illinois Administrative Code Part 460 for work performed as a contractor to the Ameren Companies?

Response: No.

Ameren Question 1.05: If your answer to Question 1.04 is affirmative, please describe the substance of these communications and the conclusions, if any, communicated to you by Commission Staff.

Response: N/A

Ameren Question 1.06: Do you know if the work that Cellnet employees will perform as part of the Ameren Companies AMR deployment different from the meter-related work performed by IBEW journeyman metermen and journeyman linemen?

Response: Yes.

Ameren Question 1.06A: If your answer to Question 1.06 is affirmative, please explain the differences.

Response: Cellnet employees will perform services in connection with the wireless communications and back office support. The installation of the meters will be performed by IBEW journeyman metermen and journeyman linemen employed by Terasen, I do not anticipate that the Cellnet employees will perform meter-related field work.

Ameren Question 1.07: Do you know whether an electric meter can function without an AMR module?

Response: Yes, it can.

Ameren Question 1.08: Based on your response to Question 1.07, is an AMR module an integral part of an electric meter?

Response: An AMR module is not necessarily an integral part of an electric meter.

Ameren Question 1.09: Has Cellnet agreed to adhere to the requirements of Illinois Administrative Code Part 410, to the extent they are applicable, in performing work relating to the Ameren Companies' AMR deployment?

Response: Yes.

Ameren Question 1.11: Has Cellnet previously performed work for the Ameren Companies?

Response: Yes.

Ameren Question 1.11A: If your answer to Question 1.11 is affirmative, please provide a description of the general nature of the work and the time period it was performed.

Response: Cellnet has been providing a wireless AMR system and related services to Ameren for more than 10 years.

Ameren Question 1.12: Are you aware of any instance where any work performed by Cellnet employees on behalf of the Ameren Companies has resulted in personal injury to anyone?

Response: I am not personally aware of any specific injuries.

Ameren Question 1.12A: If your answer to Question 1.12 is affirmative, please describe each incident(s) for which you have personal knowledge.

Response: N/A

Ameren Question 1.13: Are you aware of any instance where any work performed by Cellnet employees on behalf of the Ameren Companies has resulted in damage to customer property?

Response: I am not personally aware of specific damage to customer property.

Ameren Question 1.13A: If your answer to Question 1.13 is affirmative, please describe each incident for which you have personal knowledge.

Response: N/A

Ameren Question 1.14: Are you aware of any instance where any work performed by Cellnet employees on behalf of the Ameren Companies has resulted in damage to any Ameren Company's property or facilities?

Response: I am not personally aware of any specific damage to Ameren property.

Ameren Question 1.14A: If your answer to Question 1.14 is affirmative, please describe each incident for which you have personal knowledge.

Response: N/A

VERIFICATION

State of District of Columbia }

County of D.C. }

CLARK KERBISON [Witness], being first duly sworn on oath, deposes and states that he/she has prepared and read the foregoing answers to above written questions, produced the documents and materials requested by the above questions, and the answers made and documents and information produced herein are true, correct, and complete to the best of his/her knowledge and belief.


Signature

SUBSCRIBED AND SWORN to before me
this 20th day of June, 2006


Notary Public

My Commission Expires: 10/14/10

CHRISTOPHER SMARGISO
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires October 14, 2010

